

11-mj-4266-TSH

AFFIDAVIT

I, Robert DiSalvatore, being duly sworn, depose and state as follows:

1. I am a Task Force Officer of the Federal Bureau of Investigation ("FBI") and have been so employed for approximately four years. I am currently assigned to the Violent Crimes Task Force (the "Task Force"), which is comprised of personnel from the FBI, the Massachusetts State Police, and the Boston, Malden, Saugus and Somerville Police Departments. During my tenure as a federal law enforcement officer I have been involved in numerous bank robbery investigations.

2. I am aware that Title 18 of the United States Code, Section 2113(a) makes it a crime for anyone to use force and violence, or intimidation, to take or attempt to take from the person or presence of another, money belonging to or in the care, custody, control, management, or possession of another, money belonging to or in the care, custody, control management, or possession of any federally insured bank, and that Title 18 of the United States Code, Section 2113(d), provides that whoever, in committing or attempting to commit a violation of Section 2113(a) assaults any person or puts in jeopardy the life of any person by the use of a dangerous weapon or device is subject to increased penalties. Having so said, I make this affidavit in support of a criminal complaint charging **PATRICK M. CANNON** ("Cannon") dob xx/xx/1956, with the August 17, 2011 robbery of the

Cambridge Trust Company located at 65 Beacon Street, Boston, MA.

3. The facts stated herein are based on my personal knowledge, as well as information provided to me by witnesses and other law enforcement officials involved in the investigation, and from reviewing evidence such as bank surveillance images. In submitting this affidavit, I have not included each and every fact known to me about this investigation, but only those facts which are necessary to establish the requisite probable cause.

4. I am aware that on the date of August 17, 2011, the deposits of Cambridge Trust Company were insured by the Federal Deposit Insurance Corporation (Certificate #81582-3).

5. On August 17, 2011, at approximately 5:19 p.m., an unidentified male entered the Cambridge Trust Company located at 65 Beacon Street, Boston, MA. The individual, approximately 5'8" to 6', was dressed in a white, hooded graduation gown, a black ski mask, gloves, and white sneakers.

6. The individual brandished a black semi-automatic handgun and walked up to the tellers' desk and stated, "don't move, don't do anything stupid, I'm going to shoot you." He then approached two tellers, pointed the handgun at them and stated, "give me fifties and hundreds."

7. The tellers each handed the individual money from their drawers and the individual left the bank. One of the tellers inserted a GPS tracker pack in the money given to the individual.

The individual took the money and exited the bank. Witnesses stated that upon exiting the bank the individual took a right, entered the driver's door of a black Cadillac SUV with MA plate **2FL870**, and left the scene. A post robbery audit determined that the individual had taken \$5,799.00 in United States Currency.

8. Information about the robbery, the individual's physical description, and a description of the getaway vehicle was relayed to the FBI's Violent Crimes Task Force and the Boston Police Department.

9. The black Cadillac SUV was located a short time later, abandoned on the intersection of Berkeley and Marlborough Streets.

10. A short time later, the GPS tracking device gave off a signal at a parking garage located at 35 Westland Avenue in Boston.

11. Responding units, utilizing a handheld GPS unit, were able to determine that the signal was emitting from a green Plymouth Breeze, with Vermont license plate **FXX916**, located on the second floor of the Westland Avenue garage.

12. A protective sweep of the car and its trunk was conducted and recovered a large sum of United States currency (which contained the GPS tracking device), clothing, a cell phone, and a Colonnade Hotel receipt in the name of PATRICK CANNON. A record check revealed an outstanding Federal warrant

in the name of PATRICK M. CANNON.

13. The owner of the green Plymouth was determined to be Timothy Valley ("Valley") of Vermont. Valley was contacted and stated that he had recently loaned his automobile to his brother PATRICK CANNON who was using it in the Boston area.

14. Agents were able to view video surveillance from the parking garage from earlier in the day. The video depicted the green Plymouth entering the garage, and a short time later a white male wearing a purple shirt, plaid shorts, and carrying a back pack exit the garage.

15. Agents interviewed employees at the Colonnade Hotel and viewed video surveillance. Information was received that an individual, named PATRICK M. CANNON, had recently stayed at the hotel. The video surveillance depicted this individual checking out earlier in the day wearing a white shirt and plaid shorts.

16. At approximately 10:44 p.m., information was received from the security officer at the parking garage that the individual depicted in the surveillance video had re-entered the garage and was looking for his vehicle. The security guard stated that the individual was wearing a purple shirt and plaid shorts. The guard started following the individual who then fled the garage on foot.

17. At approximately 10:50 p.m., the individual returned to the garage. That information was relayed to Boston Police who

responded to the scene and located the individual a short distance away. The individual, later identified as PATRICK M. CANNON, was wearing a purple shirt and plaid shorts. These items of clothing appear to be similar to those worn by the individual observed on the garage surveillance videos.

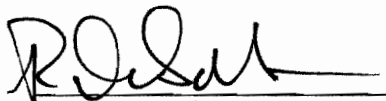
18. CANNON was arrested on the outstanding Federal warrant and returned to the Boston Police Station for booking. Once at the station CANNON was provided with his Miranda rights by TFO Robert DiSalvatore and SA Daniel Romanzo. CANNON agreed to speak with the officers, but did not want the interview recorded and signed a form indicating such.

19. During the interview CANNON admitted his involvement in the robbery of the Cambridge Trust¹. CANNON further stated that he disposed of the gun(fake), and white graduation gown he utilized in the robbery of the Cambridge Trust, in the men's room trash barrel at Whole Foods, which is located in the Westland Avenue parking garage. These items were located and seized by SA Eric Toole of the FBI. CANNON was then shown pictures of the robbery. CANNON also stated that he was the individual in the pictures and signed each.

20. Based upon the above, I believe that there is probable


¹ Cannon additionally discussed his involvement in two other recent armed bank robberies

cause to believe that on the date of August 17, 2011, **PATRICK M. CANNON**, did by force and violence, or by intimidation, take from the person and presence or employees of the Cambridge Trust, money belonging to and in the care, custody, control, management, and possession of the Cambridge Trust, a federally insured financial institution, and in doing so did assault or put in jeopardy the life of another person by the use of a dangerous weapon or device all in violation of Title 18, United States Code, Section 2113(a) and (d).



ROBERT DiSALVATORE
Task Force Officer
Federal Bureau of Investigation

SUBSCRIBED and SWORN to before me this 15 day of September, 2011


TIMOTHY S. HILLMAN
UNITED STATES MAGISTRATE JUDGE
FOR THE DISTRICT OF MASSACHUSETTS